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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT, SAN JOSE DIVISION

NOEL ALLEN AND ANALISA ALLEN,)
minors by and through their)
Guardian Ad Litem, RICHARD H.)
WEST)

Plaintiffs,)

vs.)

COUNTY OF MONTEREY; LUCILLE)
HRALIMA as an employee of the)
COUNTY OF MONTEREY; STEVEN)
SINOR as an employee of the)
COUNTY OF MONTEREY; MICHELLE)
CASSILLAS as an employee of)
the COUNTY OF MONTEREY; PAT)
MANNION as an employee of the)
COUNTY OF MONTEREY; ELVA)
MANCILLA as an employee of the)
COUNTY OF MONTEREY; ADA)
SIFUENTES and ANTONIO)
SIFUENTES, as agent and/or)
state actor of the COUNTY OF)
MONTEREY;)
and DOES 1 to 100,)
Inclusive,)
Defendants.)

CASE NO: C08 00689 RMW

EX PARTE APPLICATION TO SEAL
ORIGINAL COMPLAINT AND AMEND
CAPTION AND DECLARATION OF
COUNSEL FOR PLAINTIFFS IN
SUPPORT THEREOF

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COMES NOW, the Plaintiffs by and through their attorney of record, respectfully moving the Court to enter it's order as follows:

1. That the original complaint and all subsequent documents filed in this matter which include the full names of Plaintiff minors (hereinafter referred to by their initials N.A. (DOB: 02/18/00) and A.A. (DOB: 03/07/99)) shall be sealed from public review and access, including not being accessible on ECF/Pacer, unless otherwise ordered or authorized by the Court; except that counsel of record for the parties may review said documents unless otherwise ordered by the Court.

2. That all further references to Plaintiff minors in any pleadings filed with the Court shall be referenced by the Plaintiff minors initials (N.A. and A.A.).

DECLARATION OF COUNSEL

I, DONNIE R. COX, hereby declare:

1. I am one of the attorneys of record for Plaintiff minors in the above District Court matter and am a licensed attorney in all of the courts of the State of California and this Federal District Court.

2. I personally prepared this application and I declare all representations therein to be true and correct.

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1 3. That the interest of the privacy and the minor Plaintiffs will
2 be served by the Court's entry of the orders as requested
3 hereinbefore in this application.

4 I declare, under penalty of perjury, pursuant to the laws of
5 the State of California and the United States of America.

6 DATED: 4/10/08


DONNIE R. COX, attorney
Plaintiffs